

EXHIBIT N

DEBORAH NEGRYCH

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK

DARCY M. BLACK,

Plaintiff,

-vs-

BUFFALO MEAT SERVICE, INC., doing business
as BOULEVARD BLACK ANGUS, also known as
BLACK ANGUS MEATS, also known as
BLACK ANGUS MEATS & SEAFOOD,
ROBERT SEIBERT,
DIANE SEIBERT,
KEEGAN ROBERTS,

Defendants.

Examination Before Trial of

DEBORAH NEGRYCH, taken pursuant to the Federal Rules of
Civil Procedure, in the law offices of GRECO TRAPP, PLLC,
1700 Rand Building, 14 Lafayette Square, Buffalo, New York,
taken on January 8, 2018, commencing at 9:36 A.M., before
MARY ANN MORETTA, Notary Public.

1 A. No.

2 Q. And did you ever, at any time, tell Jamie that
3 Darcy didn't find it funny, his joking about her
4 children?

5 A. She didn't say that to me.

6 Q. No. Did you ever tell Jamie that Darcy didn't
7 find it funny relative to him joking about her
8 children?

9 A. No.

10 Q. Okay. Did you ever tell Jamie that he had to
11 stop doing anything relative to Darcy Black?

12 MR. OPPENHEIMER: Form.

13 THE WITNESS: Yes.

14 BY MS. GRECO:

15 Q. What?

16 A. Darcy came to me and said she doesn't find
17 Jamie's jokes funny anymore. I said Jamie, Darcy
18 doesn't find your jokes funny anymore.

19 Q. And do you know -- did you ever ask what Darcy
20 meant about Jamie's, quote, unquote, jokes?

21 A. No.

22 Q. Do you know if Jamie Lapress referred to
23 African-American customers as nigs?

1 A. No, he never did.

2 Q. You know for sure he never did?

3 A. I never heard him.

4 Q. Well, you didn't work in the pack room, did you?

5 MR. OPPENHEIMER: You are arguing with her now.

6 BY MS. GRECO:

7 Q. You said he never did. What I want to know is

8 how do you know that?

9 MR. OPPENHEIMER: She said she never saw or heard

10 him.

11 THE WITNESS: I never heard it.

12 BY MS. GRECO:

13 Q. How much time would you see him during the day?

14 A. About half the day.

15 Q. Okay. So he would spend half the day in the

16 front of the room?

17 A. In the washroom. He was mostly in the washroom.

18 Q. He spent most of the day in the washroom?

19 A. In the washroom, washing trays in there, yes.

20 Q. What else would he do in the washroom?

21 A. Put the load away.

22 Q. Anything else?

23 A. I never paid attention to what other people did.

1 at Black Angus?

2 A. No.

3 Q. Once she started working at Black Angus, was she

4 a full-time worker?

5 A. Yes.

6 MR. OPPENHEIMER: Form.

7 BY MS. GRECO:

8 Q. What would her schedule have been?

9 A. Usually she was on later in the day. She would

10 close at night.

11 Q. And did she work Saturdays?

12 A. Yes.

13 Q. Okay. And would that also be later in the day --

14 strike that. What were the hours normally on

15 Saturday at Black Angus Meat?

16 A. We were there nine to six.

17 Q. And on Saturdays, did she work nine to six or did

18 she have different hours?

19 A. She would come in a little later, but you don't

20 get out at six because Saturdays everything has

21 to be wrapped and taken care of because we are

22 closed on Sunday and Monday.

23 Q. Would she then close out on Saturdays?

1 Q. Did you ever have any understanding where this
2 incident occurred between Jamie Lapress and Darcy
3 Black?

4 A. I don't recall.

5 Q. Do you recall if anyone ever told you?

6 A. No, I don't. I knew nothing about it. I wasn't
7 there. I didn't know anything about it. I may
8 have been there, but I didn't know anything about
9 it.

10 Q. Okay. Did anyone, other than Keegan Roberts,
11 ever speak to you regarding this incident?

12 MR. OPPENHEIMER: Form.

13 BY MS. GRECO:

14 Q. I'm asking at any time, that means before or
15 after Darcy Black left Black Angus Meat.

16 A. No.

17 Q. Okay. Do you recall Miss Black saying to you --
18 complaining to you that Mr. Lapress referred to
19 her children as niggers?

20 A. No.

21 Q. Do you recall Miss Black telling you -- well,
22 strike that. Do you recall Miss Black saying
23 that Mr. Lapress said to her you have two -- do